



OneWeb  
1400 Key Blvd.  
Suite 1, Floor A  
Arlington, VA 22209

September 21, 2017

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**Re: Thirteenth Section 706 Report Notice of Inquiry, GN Docket No. 17-199**

Dear Ms. Dortch:

WorldVu Satellites Limited (“OneWeb”) welcomes the opportunity to submit these comments in response to the Commission’s Notice of Inquiry in the above-captioned proceeding.<sup>1</sup>

**OneWeb’s Mission**

OneWeb’s primary mission is to bridge the digital divide for the billions of unconnected people worldwide by providing satellite broadband services equivalent to those found in any city in terms of throughput and latency. OneWeb is on the verge of fundamentally changing the way remote and rural citizens, enterprises, and public infrastructure worldwide will connect to the Internet. OneWeb will launch its first production satellites next year. Once operational, the OneWeb low Earth orbit (“LEO”), non-geostationary (“NGSO”), fixed-satellite service (FSS”) system will greatly contribute to closing the digital divide in rural and remote communities. As the Commission has long recognized, connecting the currently unconnected will increase

---

<sup>1</sup> See *Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion*, Thirteenth Section 706 Report Notice of Inquiry, GN Docket No. 17-199, FCC 17-109 (rel. Aug. 8, 2017) (“NOI”).

---

economic growth, facilitate civic participation, and improve educational opportunities in the U.S.<sup>2</sup>

OneWeb is a global communications company that will partner with mobile network operators, Internet service providers, cable operators, service partners, and others to provide coverage all over the world, beyond the reach of existing terrestrial networks. OneWeb's NGSO FSS satellites will be connected through gateways on the ground to low-cost user terminals to enable affordable, seamless, and ubiquitous coverage.

### **OneWeb's Investments in Broadband Infrastructure**

OneWeb's significant infrastructure investments demonstrate its commitment to bridging the digital divide. OneWeb is making substantial progress toward launching its global satellite constellation and recently obtained a grant of U.S. market access from the Commission for its Ku/Ka-band NGSO FSS system.<sup>3</sup> OneWeb expects these substantial efforts to result in a constellation that will serve as a critical component of Commission-led efforts to bridge the digital divide in the U.S.

In particular, OneWeb is investing heavily in new infrastructure in support of its NGSO FSS constellation. To this end, OneWeb is building its new, high-volume, state-of-the-art satellite production facility in Exploration Park, Florida and developing Internet gateways in multiple locations around the U.S. These infrastructure investments will directly support OneWeb's constellation deployment beginning in 2018.

---

<sup>2</sup> Federal Communications Commission, Omnibus Broadband Initiative, CONNECTING AMERICA: THE NATIONAL BROADBAND PLAN (2010) at 29, available at [http://hraunfoss.fcc.gov/edocs\\_public/attachmatch/DOC-296935A1.pdf](http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-296935A1.pdf) ("Broadband is changing many aspects of life – increasing business productivity, improving health care and education, enabling a smarter and more efficient power grid and creating more opportunities for citizens to participate in the democratic process.").

<sup>3</sup> See *WorldVu Satellites Limited, Petition for a Declaratory Ruling Granting Access to the U.S. Market for the OneWeb NGSO FSS System*, Order and Declaratory Ruling, 32 FCC Rcd 5366 (2017).

---

## Emergence of Satellite Broadband in Rural Areas

In the NOI, the Commission asks whether there are qualitative factors it should consider when analyzing whether broadband is being deployed, such as the emergence of satellite broadband in rural areas.<sup>4</sup> OneWeb expects that its NGSO FSS constellation will further contribute to the emergence of satellite broadband as a viable competitor to terrestrial-based broadband providers. As an example, OneWeb's exciting plans for Alaska are relevant to this inquiry. Unlike traditional geosynchronous orbit satellites, OneWeb's satellites will operate in near-polar orbits, ensuring OneWeb can deliver high-speed, low-latency service to every Alaskan.

For some parts of Alaska, there are no roads connecting towns and tribal centers, and the harsh environment can make it particularly challenging for terrestrial systems to function. OneWeb has developed a unique solution to overcome the barriers of terrain and weather. While rural Alaskans have often paid high prices for connectivity while receiving less than adequate service, OneWeb plans to change this dynamic. OneWeb's system will enable coverage for *everyone*, regardless of location.

OneWeb's service to Alaska via its low-latency, ultra-high-throughput satellite technology will match terrestrial quality broadband and support streaming, video conferencing, voice communications, and latency-sensitive applications. OneWeb is in a unique position to improve educational opportunities and drive economic growth and stability by fostering local entrepreneurship and local jobs. By 2019, OneWeb plans to begin offering service in Alaska and, shortly thereafter, service to all locations—rural, suburban, and urban—within the U.S. and its territories.

## Conclusion

In 2012, OneWeb was founded with a mission to enable GDP-adjusted affordable access for everyone. OneWeb also disclosed its system design, including its innovative and highly efficient re-use of Ku-band spectrum. Next year this vision will become a reality with the first launches of OneWeb's production satellites. The following year, OneWeb, through thousands of local ISPs and telecom operators, will begin the process of closing the digital divide for all Americans.

---

<sup>4</sup> See NOI at ¶ 33.

---

OneWeb looks forward to working with the Commission to help unlock these benefits and maintain the United States' leading role in facilitating space-augmented telecommunications infrastructure.

Respectfully Submitted,

*/s/ Mariah D. Shuman*

Mariah D. Shuman  
Senior Director of Regulatory Affairs